

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

- vs. -

Case No. 19-CR-227-LJV

JOSEPH BONGIOVANNI,

*Defendant.*

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**NOTICE OF MOTION TO SEVER DEFENDANT FOR TRIAL**

**Motion Made By:** Defendant, by and through counsel.

**Date, Time and Place:** TBD  
Hon. Lawrence J. Vilardo  
United States Courthouse  
2 Niagara Square  
Buffalo, NY 14202.

**Supporting Papers:** Declaration of Parker R. MacKay, Esq., executed on  
December 19, 2023.

**Relief Requested:** An order (1) severing Defendant for trial, (2) setting a trial  
date no later than February 12, 2024, and (3) modifying the  
pretrial protective order accordingly, along with such other  
and further relief as the Court deems just and proper.

Dated: December 19, 2023  
Kenmore, New York

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